

1 FRANK H. COFER III, ESQ.
Nevada Bar No. 11362
2 **COFER & GELLER, LLC**
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5 *Attorney for Defendant Karapetyan*

6 UNITED STATES DISTRICT COURT
7 FOR THE DISTRICT OF NEVADA

8 THE UNITED STATES OF AMERICA,
9 *Plaintiff,*
10 *vs.*
11 VAGE KARAPETYAN, *et al.*,
12 *Defendants.*

Case no. 2:16-cr-230-GMN-CWH

**DEFENDANT VAGE KARAPETYAN'S
UNOPPOSED MOTION AND [PROPOSED]
ORDER TO PERMIT DEFENDANT TO
TRAVEL TO THE STATE OF MICHIGAN
FROM 03/17/2019 TO 03/25/2019**

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14 NOW COMES Defendant VAGE KARAPETYAN, by and through FRANK H. COFER III, ESQ.
15 of COFER & GELLER, LLC, and hereby moves this Honorable Court to temporarily permit
16 Defendant to travel to the State of Michigan during the dates of 03/17/2019 to 03/25/2019
17 so that he can attend the Birmingham Royal Oak Surgical Center located in 5130 Coolidge
18 Highway, Suite 210, Royal Oak, Michigan 48073. This is the defendant's sixth request for a
19 temporary relaxation of his terms of pretrial release.

20 This motion is unopposed by the U.S. Attorney's office and is unopposed by pretrial
21 services, and is made and based on all the papers and pleadings on file herein and the
22 declaration of counsel filed herewith.

23 RESPECTFULLY SUBMITTED this 14th day of March, 2019.
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25 COFER & GELLER, LLC

26 By: /s/ Frank Cofer

27 FRANK H. COFER III, ESQ. (NV #11362)
28 *Attorney for Defendant Karapetyan*

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DECLARATION OF COUNSEL

FRANK H. COFER III, ESQ., makes the following declaration:

1. I am an attorney licensed to practice law in all state courts in the State of Nevada, before the United States District Courts in the district of Nevada, and before the Ninth Circuit Court of Appeals.

2. I am retained to represent Defendant VAGE KARAPETYAN in the instant action and am making this declaration in support of DEFENDANT VAGE KARAPETYAN'S UNOPPOSED MOTION AND [PROPOSED] ORDER TO PERMIT DEFENDANT TO TRAVEL TO THE STATE OF CALIFORNIA FROM 03/17/2019 TO 03/25/2019 that is filed herewith. I have personal knowledge and am competent to testify to the matters stated herein.

3. I am informed and I believe that my client, Defendant VAGE KARAPETYAN, wishes to travel and will be accompanied by his father Aragats Karapetyan to the Birmingham Royal Oak Surgical Center in order to undergo anesthesia detoxification for opioids during the dates of 03/17/2019 to 03/25/2019. However, his current conditions of release prohibit him from traveling outside of the State of Nevada.

4. My office has communicated with U.S. Pretrial Services employee Kelly Bowen (responsible for supervising the defendant) and AUSA ROBERT KNIEF (responsible for prosecuting this case) regarding this matter. Both of these individuals have indicated that they have no opposition to the instant motion.

5. I declare under penalty of perjury pursuant to 28 U.S.C. § 1746 that the foregoing is true and correct except as to those matters stated herein upon information and belief.

EXECUTED on March 14th, 2019 at Las Vegas, Nevada.

COFER & GELLER, LLC

By: /s/ Frank Cofer

FRANK H. COFER III, ESQ. (NV #11362)
Attorney for Defendant Karapetyan

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ORDER

THIS MATTER having come before the Court via an unopposed motion, and good cause appearing therefor,

IT IS HEREBY ORDERED that the conditions of pretrial release as to Defendant VAGE KARAPETYAN are temporarily modified in order to permit him to travel to the State of Michigan during and throughout the following dates only: Sunday, March 17th, 2019 through Sunday, March 25th, 2019 .

DATED this 15 day of March, 2019.

By: 

UNITED STATES DISTRICT / MAGISTRATE JUDGE

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DEFENDANT VAGE KARAPETYAN’S UNOPPOSED MOTION AND [PROPOSED] ORDER TO PERMIT DEFENDANT TO TRAVEL TO THE STATE OF MICHIGAN FROM 03/17/2019 TO 03/25/2019.

By: /s/ April Burt
APRIL B. BURT
An employee of COFER & GELLER, LLC